



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

DOUGLAS HANDSHOE

v.

AARON F. BROUSSARD, DANIEL ABEL  
CHARLES LEARY, VAUGHN PERRET  
CHRIS YOUNT, TROUT POINT LODGE  
LIMITED, NOVA SCOTIA ENTERPRISES,  
LLC

Civil Action No.1:13cv251-LG-JMR

PLAINTIFF'S MOTION TO STRIKE DEFENDANT NOVA SCOTIA ENTERPRISES LLC'S  
ANSWER AS NOT BEING FILED TIMELY BY A LICENSED MEMBER OF THE  
MISSISSIPPI BAR ADMITTED TO PRACTICE IN THE UNITED STATES DISTRICT  
COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI AND TO ADMONISH  
RONALD VEGA TO COMPLY WITH MISSISSIPPI'S LAW REGARDING THE PRACTICE  
OF LAW WITHOUT A LICENSE

Comes now Plaintiff Douglas Handshoe pursuant to Rule 12(f) of the Federal Rules of Civil Procedure, who respectfully move this Court for an Order striking Defendant Nova Scotia Enterprises, LLC (a) Joinder in Document (Docket #12); (b) Motion for Extension of Time to File Answer (Docket #13); (c) Motion to Dismiss (Docket #14); (d) Motion for Extension of Time to File Response/Reply (Docket #15); (e) Memorandum in Support of the Motion to Dismiss (Docket #22) and (f) Admonish Attorney Ronald Vega to comply with Section 75-3-55, Mississippi Code Annotated (1972) and local rule 83.1(d) (1)-(9) regarding the practice of law without a license in the State of Mississippi and Pro Hack Vice enrollment in the United States District Courts for the Southern District of Mississippi.

1.

On June 24, 2013 Louisiana Attorney Ronald Vega filed with this honorable court Joinder in Document (Dckt. 12), Motion For Extension of Time to File Answer (Dckt. 13), Motion to Dismiss (Dckt. 14) and Motion For Extension of Time to File Response/Reply (Dckt. 15). ON June 24, 2013 the Clerk of this Honorable Court issued a letter to Attorney Vega requesting Attorney Vega comply with local rule 83.1(d) (1)-(9) (Dckt 16) and obtain Pro Hack Vice Admission to practice law before this Honorable Court. Attorney Vega has ignored this letter and in fact subsequently filed another pleading on behalf of Nova Scotia Enterprises, LLC.

2.

On June 26, 2013 and June 27, 2013, by order of this Honorable Court, Nova Scotia Enterprises LLC was given an extension of time until July 17, 2013 to file any its answer and related supplementary memoranda. The docket of in this instant case reveals defendant Nova Scotia Enterprises filed to honor the court's deadline, filing a motion to dismiss on July 18, 2013. (Dckt. 22)

3.

Attorney Vega has no standing to act as Attorney for Nova Scotia Enterprises, LLC in the United States District Courts for the Southern District of Mississippi and thus all pleadings submitted under his signature should be struck from the record.

4.

Attorney Vega submitted his Motion to Dismiss after the court's deadline thus defendant Nova Scotia Enterprises, LLC Brief in Support of Motion to Dismiss should be struck from the record and default entered against defendant Nova Scotia Enterprises.

#### CONCLUSION

For the foregoing reasons, Plaintiff respectfully asks this Court for an Order striking Defendant Nova Scotia Enterprises, LLC (a) Joinder in Document (Docket #12); (b) Motion for Extension of Time to File Answer (Docket #13); (c) Motion to Dismiss (Docket #14); (d) Motion for Extension of Time to File Response/Reply (Docket #15); (e) Memorandum in Support of the Motion to Dismiss (Docket #22) and (f) Admonish Attorney Ronald Vega to comply with Section 75-3-55, Mississippi Code Annotated (1972) and local rule 83.1(d) (1)-(9) regarding the practice of law without a license in the State of Mississippi and Pro Hack Vice enrollment in the United States District Courts for the Southern District of Mississippi.

Respectfully submitted



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**CERTIFICATE OF SERVICE**

I, Douglas Handshoe, certify I have sent a true and correct copy of the foregoing motion to the following via United States Mail:

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